

## REMARKS/ARGUMENTS

Claims 49-62 are pending. Claim 49 has been amended. Claim 62 has been added. Applicant respectfully requests reexamination and reconsideration of the pending claims.

### Rejection under 35 U.S.C. 103(a):

Claims 57-59 are rejected under 35 U.S.C. 103(a) as being unpatentable over Keaton in view of Culp et al. (USPN 6,976,627).

The Applicant has contacted the Examiner to inform the Examiner that the Culp et al. reference is improper as it has a filing date subsequent to the filing date of the instant application.

Applicant gratefully acknowledges that the Examiner has agreed to remove the finality of the present Office Action regarding Claims 57-59 in light of this revelation.

Accordingly, Applicant believes that since a proper 103(a) rejection has not been made, Claims 57-59 are allowable and allowance of the claims is requested.

### Rejection under 35 U.S.C. 102(b):

Claims 49-53 and 61 are rejected under 35 U.S.C. 102(b) as being anticipated by Murayama (USPN 5,259,745). Claims 49-51, 54-56 and 61 are rejected under 35 U.S.C. 102(b) as being anticipated by Keaton (USPN 4,824,354). Applicant overcomes the rejections as follows.

Claim 49 sets forth a “the workpiece manipulator and mold and plug manipulator configured to cause a single workpiece and a single mold and plug to substantially simultaneously arrive at the workpiece operation chamber to allow the workpiece manipulator to present the single workpiece to the single mold and plug so that the single workpiece is formed into a molded item through the cooperative engagement of the single mold and plug.” Claim 49 further sets forth that “each single mold and plug represent[] a unique configuration.” Applicant could find no disclosure of these features in Murayama or Keaton.

In contrast to Claim 49, Murayama discloses a system in which the “closure shells 32” are carried to a press tool assembly. Applicant could find no teaching or suggestion in Murayama that anticipates a workpiece manipulator and mold and plug manipulator

configured to cause a single workpiece and a single mold and plug to substantially simultaneously arrive at the workpiece operation chamber. Moreover, there is no teaching or suggestion in Murayama that anticipates that each single mold and plug represents a unique configuration.

In contrast to Claim 49, Keaton discloses a system having two tracks that bring molds that converge at the press input where sheet material is fed in. Applicant submits that Keaton fails to teach or suggest a workpiece manipulator and mold and plug manipulator configured to cause a single workpiece and a single mold and plug to substantially simultaneously arrive at the workpiece operation chamber, where “each single mold and plug represents a unique configuration.”

Accordingly, since Murayama and Keaton fail to teach or suggest Applicant’s invention as set forth in Claim 49, allowance of Claim 49 is respectfully requested.

Claims 50-61 depend from Claim 49 and are therefore allowable for at least the same reasons as Claim 49.

#### New Claim

Claim 62 has been added. Claim 62 sets forth substantially the apparatus as set forth in original Claim 49 with the addition of ‘a laser-marking system operable to mark each molded item following its removal from the workpiece operation chamber; and a trimming system operable to trim each molded item following its removal from the workpiece operation chamber.’ Applicant could find no teaching or suggestion of an apparatus having this combination in either Murayama or Keaton. Accordingly, Claim 62 is allowable over the cited references.

Respectfully submitted,

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